

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

REVLON CONSUMER PRODUCTS LLC
and ELIZABETH ARDEN, INC.

Plaintiffs,

-against-

GIVE BACK BEAUTY S.A., et al.,

Defendants.

Case No. 1:24-cv-06438-ER-RWL

DECLARATION OF LINDA KING

I, LINDA KING, declare and state as follows:

1. I am Senior Director of Information Technology (“IT”) Infrastructure and End User Services at Plaintiff Revlon Consumer Products LLC (“Revlon”). I have worked at Revlon since 2017. Previously, I worked at Elizabeth Arden, Inc. (“Elizabeth Arden”) since 2002. I make this declaration based on personal knowledge, the books and records of Plaintiffs Revlon and Elizabeth Arden, information imparted to me in the ordinary course of business from individuals with a business duty to know that information, and on information and belief.

2. As part of my job responsibilities at Revlon, I am responsible for supervising the teams that manage storage and servers in Revlon’s data centers, P.C.s and laptops, as well as help-desk services.

3. I reviewed the publicly filed Declarations of Vanessa Kidd and Ashley Fass associated with Defendants’ Opposition to Plaintiffs’ Motion for a Preliminary Injunction.

Vanessa Kidd

4. Vanessa Kidd's last day of employment at Revlon was May 3, 2024. Revlon's card swipe records show that her last day in Revlon's offices at 55 Water Street was on May 2, 2024. Kidd returned her work laptop to Revlon by Fedex, which was received by FedEx in Elmsford, New York on May 6, 2024. Attached hereto as Exhibit A is the Fedex label and tracking information, with Tracking ID 734684271450.

5. I understand that Ms. Kidd states that the activity that Revlon's computer forensics expert detected on her laptop hard drive between 9:45 p.m. on May 3 and 12:15 a.m. on May 4 reflects her transfer of files from her laptop to Revlon's servers.

6. Revlon's servers show that a "V.Kidd\Desktop 5.3.24" folder was created on a shared marketing drive at 4:25 p.m. on May 3, 2024. This folder contains 45 subfolders, all of which have earlier creation dates. Attached hereto as Exhibit B are screenshots of the folder, and subfolders, as they existed on the Revlon network as of September 23, 2024.

7. Revlon's servers show that information within many of the subfolders within the "V.Kidd\Desktop 5.3.24" folder was modified on May 3 and 4, 2024. The modification times on those dates range from 4:28 p.m. to 12:17 a.m.

8. Ms. Kidd's access to the Revlon computer systems was removed on May 4, 2024 at 1:39 am.

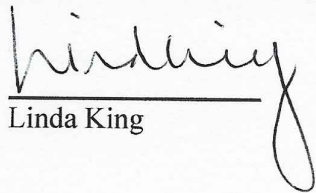
9. I understand that Ms. Kidd states that she was concerned that Revlon might assign her laptop to another user without removing her working files. That concern is unwarranted. Revlon's Information Technology staff ensures that any re-purposed laptops are completely re-imaged before being assigned to new users.

Ashley Fass

10. Ashley Fass was last provided with a Revlon laptop on November 12, 2019. Ms. Fass used that laptop until her last day of work at Revlon in May 2024.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at London, United Kingdom, on September 24, 2024.


Linda King